

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

FILED
FEB 17 2004

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Michael N. Milby, Clerk

IN RE ENRON CORP. SECURITIES,	§	
DERIVATIVE & "ERISA" LITIGATION	§	MDL 1446
	§	
	§	CA H-01-3624
MARK NEWBY, et al., vs.	§	AND CONSOLIDATED CASES
ENRON CORP., et al.	§	
	§	
	§	CA H-01-3913
PAMELA M. TITTLE, et al. vs.	§	AND CONSOLIDATED CASES
ENRON CORP., et al.	§	

**MOTION OF PORTLAND GENERAL ELECTRIC COMPANY
FOR PROTECTIVE ORDER AS TO DOCUMENTS
PRODUCED BY ARTHUR ANDERSEN**

Pursuant to Rule 26(c), Fed. R. Civ. P., non-party Portland General Electric Company moves for Protective Order as to documents produced by Arthur Anderson.

A memorandum in support of this motion accompanies this motion.

A proposed order granting the relief requested accompanies this motion.

CERTIFICATE OF CONFERENCE

The undersigned counsel certifies as follows:

By Stipulation Regarding Enron Documents Produced by Arthur Andersen dated October 27, 2003, it was agreed among the principal parties that Motions for Protection as to the Arthur Andersen documents produced to the Document Depository would be filed by February 15, 2004.

MOTION

Movant acts to protect its own interests and seek to preserve the confidentiality of its confidential information contained in documents produced to the Document

1992

Depository by Arthur Andersen. By way of this Motion, Movant seeks to preserve the confidentiality of its confidential, privileged, and proprietary information and records, subject to further order of this Court and subject to the right of any party or any interested member of the public to challenge the secreting of particular documents. The specific documents for which protection is sought are identified by file names and Bates numbers in the form of order granting the requested relief which accompanies this motion.

PRAYER

WHEREFORE, premises considered, Movant respectfully requests and prays that it be granted the relief set forth in the accompanying proposed Order.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

Pursuant to Rule 5(d), Fed. R. Civ. P., I hereby certify that the foregoing motion has been served pursuant to Rule 5(b), Fed. R. Civ. P., addressed as follows:

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